

Jorge Alejandro Rojas  
[Rojas.jorge96@gmail.com](mailto:Rojas.jorge96@gmail.com)  
Plaintiff in Pro Se  
557 Cambridge Way  
Bolingbrook, IL 60440  
(424) 219-1582

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,  
  
Plaintiff,  
  
v.  
  
UNPLUGGED MEDIA, LLC, and  
ALEXANDER BYKHOVSKY,  
  
Defendants.

Case No. 2:23-cv-02667-SPG-KS

District Judge Sherilyn Peace Garnett  
Magistrate Judge Karen L. Stevenson

**RESPONSE TO MOTION TO SET  
ASIDE ENTRY OF DEFAULT**

**ORAL ARGUMENT NOT NOTICED**

Plaintiff, Jorge Alejandro Rojas, responds to Defendant Alexander Bykhovsky's<sup>1</sup> March 7, 2024 Motion to Set Aside Entry of Default (Dkt. 50). Plaintiff does not oppose, but wishes to respectfully bring some items from the motion to the Court's attention.

Defendant did not confer with Plaintiff prior to the filing of his motion. Exhibit 1 (Declaration of J. Rojas, "Rojas Dec'l", ¶ 3) L.R. 7-3. Had Defendant conferred, Plaintiff would have advised him he did not oppose the motion.

Defendant also did not notice a hearing. L.R. 6-1. Defendant's filings do not contain all the information (including e-mail and phone number) required on the title page. L.R.

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<sup>1</sup> Defendant's Motion includes a different spelling of his last name in his motion, "Bykhovskiy" (p. 1 line 18).

11-3.8. Defendant did not include a certificate of service. L.R. 5-3.1.1. Plaintiff received a copy of the motion via USPS Priority Mail from Chris Cuenza, located in Los Angeles, and Mr. Cuenza's name and information is not on the proof of service despite him being the one to serve the documents. Rojas Dec'1 ¶ 4. The copy of the Motion served on Plaintiff did not include any signature and was therefore not the same copy of what was filed with the Court. *Id.*

Plaintiff wishes to bring it to the Court's attention that the signature reflected on the Court's docket for this filing does not appear to be done by Defendant. On March 8, 2024, Defendant issued a Grant, Bargain, Sale Deed for property owned under another one of his corporate entities, Alex Gold Holdings, LLC. That deed, Exhibit 2, has a very different signature than the one reflected on the Court's docket at Dkt. 50 p. 2. Rojas Dec'1 ¶ 5. Additionally, despite Defendants claim that he is located in Panama<sup>2</sup>, the deed is notarized as being subscribed and sworn before a Notary in New York. Plaintiff believes that Defendant is not the true signer of the motion.

In recognition of the preference for a ruling on the merits, Plaintiff does not oppose Defendant's motion to set aside entry of default – but is concerned Defendants continued violation of the Court's rules, especially conferral, may result in him not allowing this action to be conducted in a “just, speedy, and inexpensive” fashion. Fed. R. Civ. P. 1.

Respectfully submitted,

Dated: March 17, 2024.

/s/ Jorge Alejandro Rojas  
 Jorge Alejandro Rojas  
[Rojas.jorge96@gmail.com](mailto:Rojas.jorge96@gmail.com)  
 Plaintiff in Pro Se  
 557 Cambridge Way  
 Bolingbrook, IL 60440  
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### **CERTIFICATE OF SERVICE**

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<sup>2</sup> An earlier, stricken filing by Defendant stated that he was a Puerto Rico resident. Dkt. 40 p. 2 (“Bykhovsky is a Puerto Rico resident.”)

1 A copy of this filing will be mailed to each Defendants last known address and/or  
2 registered agent via USPS Mail. As to Defendant Unplugged Media, LLC, it will be sent  
3 to its resident agent, PRelocate, LLC, 954 Ave Ponce de Leon, Suite 205, SAN JUAN, PR,  
4 00907. As to Defendant Bykhovsky, it will be sent to 40 Calle Elbrus, Panama City,  
5 Panama 0801. These documents will be deposited by Plaintiff into Plaintiff's mailbox for  
6 mailing on the same or next business day.

7 Dated: March 17, 2024.

8 */s/ Jorge Alejandro Rojas*

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10 **L.R. 11-6.1 CERTIFICATE OF COMPLIANCE**

11 The undersigned, Plaintiff Jorge Alejandro Rojas, certifies that this brief contains 631  
12 words, based upon Microsoft Word's calculation, which complies with the word limit of  
13 L.R. 11-6.1.

14 Dated: March 17, 2024.

15 */s/ Jorge Alejandro Rojas*  
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